

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

MARIAH CURTIS,

Plaintiff,

v.

WILLIAM ALIAS (SECURITY CREDIT
SERVICES, LLC) REPRESENTATIVE,

Defendant.

CIVIL ACTION NO.: 4:24-cv-02586

DEFENDANT WILLIAM ALIAS (SECURITY CREDIT SERVICES, LLC)
REPRESENTATIVE'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant William Alias (Security Credit Services, LLC) Representative ("Defendant") hereby removes the subject action from the Harris County Justice of the Peace Court, Precinct 7, Place 1, to the United States District Court for the Southern District of Texas on the following grounds:

1. Plaintiff Mariah Curtis instituted an action in the Harris County Justice of the Peace Court, Precinct 7, Place 1 on May 23, 2024. A copy of the Complaint is attached hereto as **Exhibit A**.
2. Defendant was served via certified mail on June 24, 2024. Therefore, removal is timely.
3. Plaintiff's Complaint alleges violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* ("FCRA") and Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA").
4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. §1331 since there is a federal question. This suit falls within the FCRA and FDCPA which supplies the federal question.
5. Pursuant to 28 U.S.C. §1441, *et seq.*, this cause may be removed from the Harris County Justice of the Peace Court, Precinct 7, Place 1 to the United States District Court for the Southern

District of Texas.

6. Notice of this removal will promptly be filed with the Harris County Justice of the Peace Court, Precinct 7, Place 1 and be served on all adverse parties.

7. Pursuant to 28 U.S.C. §1446(a), copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendant are attached hereto and marked as composite **Exhibit A** and incorporated herein by reference.

WHEREFORE, Defendant William Alias (Security Credit Services, LLC) Representative, by counsel, removes the subject action from the Harris County Justice of the Peace Court, Precinct 7, Place 1, to the United States District Court for the Southern District of Texas.

Dated: July 10, 2024

Respectfully submitted,

/s/ Xerxes Martin

**MARTIN GOLDEN LYONS
WATTS MORGAN PLLC**

EUGENE XERXES MARTIN, IV

Texas State Bar No. 24078928

Email: xmartin@mgl.law

JUSTIN HAN

Texas State Bar No. 24109971

Email: jhan@mgl.law

8750 N. Central Expressway, Suite 1850

Dallas, Texas 75231

T: 214-346-2630 | F: 214-346-2631

COUNSEL FOR DEFENDANT

CERTIFICATION AND CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2024, the foregoing was filed electronically with the Clerk of Court using the CM/ECF, and notice will be sent via ECF, Email, and/or CMRRR:

Mariah Curtis
1307 Wilcrest Dr. Apt 4511
Houston, Texas 77042
Email: curtismariah@yahoo.com

/s/ Xerxes Martin

EUGENE XERXES MARTIN, IV